

EXHIBIT 1

FACSIMILE TRANSMITTAL SHEET

TO:

Honorable Nelson S. Román

FROM:

Michael A. Charish

COMPANY:

United States District Court,
for the Southern District of New York

DATE:

7/15/2025

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RE:

***Feng et. al. v. Feng*, Civil Case No. 7:25-
cv-2396 (NSR)**

TOTAL NO. OF PAGES, INCLUDING COVER:

4

☐ URGENT

☐ FOR REVIEW

☐ PLEASE COMMENT

☐ PLEASE REPLY

☐ PLEASE RECYCLE

NOTES/COMMENTS:

Please see the attached letter responding to Plaintiffs' July 10, 2025 letter.

Respectfully submitted,

Michael A. Charish

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July 15, 2025

Via Fax

Honorable Nelson S. Román
United States District Judge
United States District Court
for the Southern District of New York
United States Courthouse
300 Quarropas Street
Courtroom 218
White Plains, New York 10601

Re: Feng et al. v. Feng, No. 7:25-cv-2396 (NSR)

Dear Judge Román:

On behalf of my client Chenchen Feng (“Chenchen”), I write in response to the July 10, 2025 letter to the Court from counsel for plaintiffs Jin Feng and Yang (“Helen”) Wang (together, “Plaintiffs”). In that letter, Plaintiffs request a conference with the Court to discuss entry of a Case Management Plan and Scheduling Order. Chenchen is supportive of that request, and respectfully requests that the scheduling conference be combined with the pre-motion conference Chenchen requested by letter dated June 30, 2025. In that letter, Chenchen requested that the Court grant her leave to file a sanctions motion because Plaintiffs’ case is intended to harass her and is negated by the evidence — including documented, clear admissions that, to the extent Plaintiffs’ paid for Chenchen’s medical-school tuition, it “was a gift,” “for free ... because we love you,” and even though they claim to be financially “highly vulnerable” and “desperate,” they are multi-millionaire real-estate investors who write text messages like, “I can afford anything I want.”

If and when the Court schedules a conference, I would look forward to discussing with Your Honor both a discovery schedule and the documentary evidence proving that Plaintiffs’ claims are false and their complaint deserving of sanctions. Regrettably, Plaintiffs’ lack of candor has influenced their July 10 letter to Your Honor and requires Chenchen to correct the record, at least in part, in this response. For example, Plaintiffs state that before they filed this action, “Chenchen never took the position that Plaintiffs’ claims were frivolous.” Ltr. at 1 n.1. That is not true. On December 23, 2024 (three months before Plaintiffs filed their complaint), I sent Plaintiffs’ counsel an eight-page letter detailing how Plaintiffs’ claim of a medical-school loan to Chenchen was “fabricated” and “manufactured.” Speaking of Plaintiffs’ newly minted loan claim, the letter stated, “None of this is true.”

Honorable Nelson S. Román

July 15, 2025

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Chenchen will not recount in this letter the history of discovery in this case, but suffice it to say that Plaintiffs' accusations of "delay ... without basis" (Ltr. at 2), and "waging a war of attrition" (Ltr. at 2 n.2) are, at best, misleading. For example:

- In the disputed, proposed Case Discovery Plan and Scheduling Order that the parties filed on May 20, 2025 (ECF No. 11) (the "Proposed Scheduling Order"), Plaintiffs stated their position "that first requests for production of documents should be served by May 30, 2025." *Id.* ¶ 6. But Plaintiffs did not serve requests for production until June 13, 2025, 14 days later.
- In the Proposed Scheduling Order, Plaintiffs wrote: "Plaintiffs' position is that interrogatories should be served by May 30, 2025." *Id.* ¶ 5. But Plaintiffs did not serve interrogatories until today, July 15 — 46 days later.

By contrast, Chenchen proposed that the parties serve initial document requests and interrogatories by June 23, 2025 (*Id.* ¶¶ 5, 6), and she served her initial document requests and interrogatories on that very date. Plaintiffs state that they "require document discovery" for depositions, but so does Chenchen. Plaintiffs' responses and objections to document requests are due next week, on July 23, and (like Chenchen) Plaintiffs have not yet commenced document production. The Proposed Scheduling Order explains Chenchen's positions on the discovery schedule — including the delay engendered by Ms. Wang's choice (which Chenchen fully supports) to spend time in China caring for Chenchen's ailing grandfather. Even prior to the Court entering a scheduling order, Chenchen has complied with her discovery obligations and intends to continue doing so.

Chenchen's husband, non-party Andrew Li (whom my firm jointly represents), likewise has complied with his discovery obligations by timely objecting to the subpoena Plaintiffs served on him and discuss in their letter. *See* Ltr. at 2. Plaintiffs' subpoena to Andrew contains anomalous, impertinent, and inappropriate requests such as requests for (i) all communications between Chenchen and Andrew about their "decision to get married," (ii) all "audiovisual recordings" — videos — Andrew has of his wife Chenchen, and (iii) all "Documents and Communications" concerning "money, assets, or resources available to" their one-year-old daughter. I will be conferring with Plaintiffs' counsel regarding the subpoena tomorrow (July 16).

Chenchen and Andrew seek to disprove Plaintiffs' false claims and end Plaintiffs' harassment as effectively and efficiently as reasonably possible, while accommodating Plaintiffs' travel schedule. If Plaintiffs continue to refuse to dismiss this action voluntarily, Chenchen supports their request for a scheduling conference and respectfully requests that the Court combine that conference with a pre-motion conference on Chenchen's prospective sanctions motion.

Respectfully submitted,

/s/ Michael A. Charish
Michael A. Charish

Honorable Nelson S. Román

July 15, 2025

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cc (via e-mail): Melissa Yang, Esq.